

REMARKS

By the above amendments, Claim 18 has been amended. Claims 18-22 are currently pending. Claims 1-17 were previously cancelled. Support for the amendment to claim 18 can be found in Figures 3A and 3B of Applicants' drawings. No new matter has been introduced by way of the amendments. Favorable reconsideration of this application is respectfully requested in view of the amendments above and the following remarks.

Claim Rejection Under 35 U.S.C. §103

Claims 18 and 20-22 were rejected under U.S.C. §103(a) as being unpatentable over Stemmler (US 5,042,791) in view of Webster et al. (US 5,559,606) ("Webster").

In order to establish a *prima facie* case of obviousness, "the prior art reference (or references when combined) must teach or suggest all the claim limitations." See MPEP §2143. It is submitted that the combination of Stemmler and Webster does not teach or suggest all of the claim limitations set forth in the amended Claim 18.

The amended claim 18 recites a "back duplex module being configured to provide a single, unidirectional loop path for flipping the media sheet one time." It is apparent from Figures 3A and 3B of Applicants' drawings that the duplex path (328, 328A, 328B, 328C) is a single, unidirectional loop path. By contrast, Stemmler discloses a side shifting inverter 40 that inverts the media sheet several times - twice about an axis perpendicular to the direction of the transport path, and once about an axis parallel to the direction of the transport path - before sending the media sheet back to the imaging section 41 (see Fig. 2; and col. 6, lines 50-62). As shown in Fig. 2 of Stemmler's disclosure, the duplex path requires the media sheet to change the direction of travel three times before returning to the imaging section 41 for printing on the second side. Fig. 4B shows a U-shaped inversion path that is one of several inversion paths that make

up the duplex path in Stemmler's reproducing machine. Thus, the duplex path disclosed by Stemmler is not a single, unidirectional loop path.

Furthermore, in Stemmler's reproducing machine, it is the leading edge of the media sheet, not trailing edge, which enters the duplex path in the inverter 40. This is apparent from FIG. 2. In section in col. 6, lines 63-68, Stemmler discloses that: "Following fusing of the toner image on the print substrate, it is directed by decision gate 39 to either tray 34 or through output rolls 42 to the side shifting inverter 40." Thus, it is apparent that the media sheet is not being reversed into the duplex path with trailing edge first by the output rollers 33 after the first side of the media sheet has been printed.

The amended claim 18 further recites that the loop path has "an entry portion that is positioned next to the media path entry" and "a portion of the linefeed-roller assembly is positioned adjacent to the duplex media path such that, after the trailing edge of the media sheet entered through the duplex path entry, the trailing edge must bypass said portion of the linefeed roller-assembly and the media path entry before entering the loop path" (emphasis added). It is submitted that Stemmler does not disclose this arrangement. Firstly, in Stemmler's machine, the entry to the inverter 40 (below the rollers 42) is not next to the media path entry (adjacent to rollers 28), and the feed roller 27 is not adjacent to the inversion or duplex path. Consequently, the media sheet in Stemmler's reproducing machine does not go through the same duplex path as that recited in claim 18.

In comparison to Applicants' duplex system, the duplex mechanism of Stemmler is more complicated, requires more components and would be more costly to assemble.

Webster fails to make up for the deficiencies of Stemmler as discussed above. Indeed, the Examiner cited Webster merely for the teaching of substituting inkjet printhead for electrostatographic aspects of an electrostatographic printer. Thus, even if the teachings of Stemmler and Webster were combined as suggested by the Examiner, the combined teachings would not result in an inkjet printer having all of the elements recited in claim 18.

Claim 19 was rejected under U.S.C. §103(a) as being unpatentable over Stemmler (US 5,042,791) in view of Webster et al. (US 5,559,606) ("Webster"), and further in view of Arcaro et al. (US 5,988,906) ("Arcaro").

Claim 19 depends on claim 18. Arcaro fails to make up for the deficiencies of Stemmler as discussed above with regard to Claim 18. The Examiner cited Arcaro merely for the teaching that it is well known to couple multiple rollers together via a gear plate so that a single motor can be used to drive all of such rollers. Thus, even if the teachings of Stemmler, Webster and Arcaro were combined as suggested by the Examiner, the combined teachings would not result in an inkjet printer having all of the elements recited in claim 19.

Conclusion

For the foregoing reasons, withdrawal of the rejections of record is respectfully requested and allowance of the present application is earnestly solicited.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Thi Dang', with a long horizontal flourish extending to the right.

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